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Attorneys for Plaintiff

UNITED STATES DISTRICT COURT DISTRICT OF NEW JERSEY

Crown Imports LLC, : Civil Action No. 17-4852 (JMV) (JBC)

.

Plaintiff, : Hon. John Michael Vazquez

Hon. James B. Clark, III

v.

:

CERTIFICATION OF

R.R. Importaciones, Inc., James Martinez, and John Does 1-10, : MICHAEL J. PISKO IN SUPPORT OF ENTRY OF DEFAULT

•

Defendants. :

Michael J. Pisko, Esq., of full age, certifies as follows:

- 1. I am an attorney at law admitted to the bar of the State of New Jersey and am associated with the law firm of Sills Cummis & Gross P.C., counsel to Plaintiff in the above-captioned litigation.
- 2. I make this Certification in support of Plaintiff's request for the Clerk to enter default pursuant to Fed. R. Civ. P. 55(a) against Defendant R.R. Importaciones, Inc. ("RR").
 - 3. Plaintiff filed the Complaint in this action on June 30, 2017.
 - 4. RR was served with the Complaint on July 11, 2017.
- 5. The Affidavit of Service for RR was filed on July 21, 2017. Attached as Exhibit A is a true and correct copy of the Affidavit of Service for RR.
 - 6. Pursuant to Fed. R. Civ. P. 12, RR was obligated to file an answer or other

responsive pleading on or before August 1, 2017.

- 7. RR has not filed any answer or other responsive pleading.
- 8. Plaintiff respectfully requests that the Clerk enter default against RR pursuant to Fed. R. Civ. P. 55.

I hereby certify under penalty of perjury that the foregoing is true and correct.

Executed on August 9, 2017

/s/ Michael J. Pisko Michael J. Pisko